

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BOBBY MORRIS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ACME ELECTRIC MOTOR, INC. D/B/A
ACME TOOLS

Defendant.

Case No.

4:25-CV-00020

JURY TRIAL DEMANDED

District Judge Matthew T. Schelp

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT
ACME ELECTRIC MOTOR, INC.’s MOTION TO
STAY THE CASE PENDING ARBITRATION PURSUANT FAA SECTION 3**

The Plaintiff, Bobby Morris, with the consent of Defendant Acme Electric Motor, Inc. (“Acme”) respectfully requests that he receive an extension of time from March 10, 2025 to March 25, 2025 in order to oppose Defendant Acme Electric Motor, Inc.’s Motion to Stay the Case Pending Arbitration Pursuant to FAA Section 3 (“Motion”). (ECF No. 13, 14).

This additional time is required for Plaintiff to address all of the arguments made in the motion as well as due to the press of existing prior business and obligations.

Granting Plaintiff this additional time until March 25, 2025, would disadvantage Acme because Acme’s 10-day reply period would coincide with a trial commitment for Acme’s lead counsel and Acme’s co-counsel being out of the country.

For that reason, Plaintiff requests and agrees that Acme may have a corresponding 14-day extension of time to file its reply memoranda in support of its Motion until April 18, 2025.

WHEREFORE, Plaintiff Bobby Morris respectfully requests that this Court enter an order granting: (1) Plaintiff additional time until March 25, 2025 to file its response to Acme's Motion; and (2) Acme additional time to file its reply memoranda in support of its Motion until April 18, 2025.

RESPECTFULLY SUBMITTED AND DATED this March 7, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this March 7, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.

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JURY TRIAL DEMANDED

District Judge Matthew T. Schelp

**[PROPOSED ORDER GRANTING]
UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT
ACME ELECTRIC MOTOR, INC.'S MOTION TO
STAY THE CASE PENDING ARBITRATION PURSUANT FAA SECTION 3**

AND NOW, this _____ day of _____, 202____, upon consideration of the Plaintiff's Unopposed Motion for Extension of Time to respond to Defendant Acme Electric Motor, Inc.'s Motion to Stay the Case Pending Arbitration Pursuant to FAA Section 3, it is ORDERED that the motion is GRANTED. Plaintiff shall have until March 25, 2025 in order to oppose Defendant's Motion to Stay/Compel Arbitration (ECF No. 13, 14), and Defendant shall have until April 18, 2025, to file its reply memoranda in support of its Motion.

District Judge Matthew T. Schelp